

---

641 Lexington Avenue  
Thirteenth Floor  
New York, NY 10022  
Telephone: (212)-404-1742  
Facsimile: (888)-833-9534

# MEDINA LAW FIRM

www.medinafirm.com

---

1200 N. Federal Highway  
Second Floor  
Boca Raton, FL 33432  
Telephone: (954)-859-2000  
Facsimile: (888)-833-9534

Writer's Email:  
emedina@medinafirm.com

Eric S. Medina, Esq.<sup>o</sup>

<sup>o</sup>Member NY, NJ & FL Bar

December 6, 2024

**VIA CM/ECF ELECTRONIC FILING**

Hon. John P. Cronan, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Honeedew Investing LLC vs. Jose Abadi*  
Case No. 19-08951-JPC-VF  
Memo Endorsement to October 5, 2024 [Dkt. 103]  
Updated Report Service

Dear Judge Cronan:

The undersigned represents Plaintiff Honeedew Investing LLC (“Honeedew” or “Plaintiff”) in the above-referenced matter. Pursuant to Your Honor’s Memo Endorsed Order of October 5, 2024 [Dkt. 103] (“Order”) please accept this status update.

As previously reported to the Court, Honeedew is aware that service of process has been effectuated pursuant to the Hague Convention in this matter. Plaintiff has requested ABC Legal (Honeedew’s service agent under the Hague Convention) for copies of certificates of service but is informed they have not yet been received from Argentina. Nevertheless, the Plaintiff respectfully submits that this matter appears to be ripe for default judgment proceedings. As such, pursuant to Rule 3d of Your Honor’s Individual Rules of Practice, Plaintiff hereby provides notice to the Court of its intent to seek a Clerk’s Certificate of Default regarding service of process in Argentina in anticipation of an application for default judgment under Local Rule 55.2(b).

Thank you in advance for Your Honor’s Consideration.

Respectfully submitted,

/s/ Eric S. Medina

Eric S. Medina, Esq.